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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SOPHIA LAWSON CLARK, et al.,  
Defendants.

CASE NO.5:23-cv-01650-MRA-DTB

**NOTICE OF LODGING OF  
PROPOSED CONSENT DECREE  
AND REQUEST TO STAY  
PROCEEDINGS**

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiff, the United States of America, by  
3 authority of the Attorney General of the United States and through the undersigned  
4 attorneys, acting at the request of the Administrator of the United States  
5 Environmental Protection Agency, is lodging a proposed Consent Decree in the  
6 above-captioned case, attached hereto, with the Court. The proposed Consent  
7 Decree has been signed by the parties.  
8  
9  
10

11 Under the terms of the Consent Decree, the United States will publish notice  
12 in the Federal Register, accept public comment on the proposed Consent Decree  
13 for a period of thirty (30) days, and address public comments, if any are received.  
14 28 C.F.R. § 50.7. Accordingly, the United States respectfully requests that the  
15 Court not take any action on the proposed Consent Decree at this time.  
16  
17

18 At the expiration of the public comment period and after the United States  
19 has reviewed and addressed any public comments that are received, the United  
20 States will either request that the Court enter the proposed Consent Decree or  
21 advise the Court that public comments have been received that warrant the United  
22 States' withdrawal from the Consent Decree.  
23  
24

25 Considering the above, and pursuant to Judge's Procedures 6, Notice of  
26 Settlement, the Plaintiff and Defendants are notifying the Court that a settlement  
27 has been reached. The Parties respectfully request the Court issue an order staying  
28

1 all proceedings pending further request from the United States to act on the  
2 Consent Decree.  
3

4 Respectfully submitted,

5 TODD KIM  
6 Assistant Attorney General  
7 Environment & Natural Resources Division  
8 U.S. Department of Justice

9 /s/ Richard Greene

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23 /s/ Mark Mazda

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28 *Attorney for Defendants Sophia Lawson Clark  
and Lopez to Lawson, Inc.*

**ATTESTATION**

I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

Dated: January 16, 2025

/s/ Richard Greene